

US EPA ARCHIVE DOCUMENT



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR L & C ANNEX, 401 CHURCH STREET
NASHVILLE, TENNESSEE 37243-1531

December 21, 2007

J.I. Palmer, Jr
Regional Administrator
US EPA, Region IV
Atlanta Federal Center, 12th Floor
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

I am enclosing for EPA's review and approval five (5) copies of the December 2007 Attainment and Milestone Report for Tennessee's Early Action Compact (EAC) Areas in Hamilton County, Middle Tennessee, and Tri-Cities. Electronic copies were submitted December 21, 2007. The state is required to submit two letters to satisfy EAC protocol. The first letter certifying the 2007 8-hour ozone ambient air monitoring data for each EAC area has been quality assured and entered into the Air Quality System. A copy of this letter submitted to EPA dated December 5, 2007 is enclosed with this submittal.

To satisfy the second EAC protocol requirement, enclosed you will find the EAC milestone reports for each EAC area and all applicable control measures have been implemented and maintained through December 2007. The state has certified that the 2005 through 2007 ozone data has been quality assured, shows attainment, and all of the EAC areas have been successful in attaining the 8-hour ozone NAAQS standard prior to December 31, 2007.

With this final EAC submittal, it is believed that the state has provided the necessary documentation showing that all EAC areas in the State of Tennessee have achieved attainment of the 8-hour ozone standard. If any additional information is needed or if you have questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Barry R. Stephens".

Barry R. Stephens, P.E., Director
Division of Air Pollution Control
Department of Environment & Conservation

Enclosures

Copy to:

Kay Prince, Dick Schutt, Jane Spann EPA Region IV
TN Air Pollution Control Board Members
Local Air Pollution Control Program Directors



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

June 27, 2007

Certified Mail #: 7007 0220 0000 1425 2772
Return Receipt Requested

David Lutz
Data Certification Contact
US EPA (D304-06)
Ambient Air Monitoring Group
Research Triangle Park, NC 27711

Dear Mr. Lutz:

The State of Tennessee and its four local air pollution control programs have completed entry of their 2006 ambient air quality data into the Air Quality Subsystem (AQS).

The purpose of this letter is to certify to the EPA that the ambient concentration data and the quality assurance data are completely submitted to AQS and that the ambient data are accurate to the best of our knowledge taking into consideration the quality assurance findings. An electronic copy of this letter and the referenced attachments will follow by email.

Should you have any questions regarding this data, please feel free to call Mr. Billy Pugh or myself at (615) 532-0554.

Sincerely,

Jackie L. Waynick, Manager
Technical Services Program

JLW:rb:gc

Cc: Letters only to the following:
Darren Palmer, EPA Region IV
Virginia Ambrose, EPA RTP
Danny France, EPA Region IV
Bob Colby, Chattanooga APC
Rob Raney, Nashville APC
Lynne Liddington, Knoxville APC
Bob Rodgers, Memphis APC
Ron Culberson, Central Office APC
Billy Pugh, Central Office APC



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Air Pollution Control
9th Floor, L & C Annex, 401 Church Street
Nashville, Tennessee 37243-1531
Telephone: (615) 532-0554

June 23, 2006

Certified Mail # 7002 2410 0005 2409 1397
Return Receipt Requested

Mr. David Lutz
109 TW Alexander Drive
MD C304-06
U.S. EPA
Research Triangle Park, NC 27711

Dear Mr. Lutz:

The State of Tennessee and its four local air pollution control agencies have completed entry of their 2005 ambient air quality data into the Air Quality Subsystem (AQS).

The purpose of this letter is to certify to the EPA that this data is true and accurate to the best of our knowledge and meets minimum reporting requirements. The AMP 240 and AMP 450 reports are attached. Electronic copies will follow.

Should you have any questions regarding this data, please feel free to call Mr. Billy Pugh or myself at (615) 532-0554.

Sincerely,

A handwritten signature in cursive script that reads "Jackie L. Waynick".

Jackie L. Waynick, Manager
Technical Services Program

JLW:lb

Attachments 2

Cc: Letters only to the following:
Darren Palmer, EPA Region IV
Virginia Ambrose, EPA RTP
Danny France, EPA Region IV
Bob Colby, Chattanooga APC
Rob Raney, Nashville APC
Lynne Liddington Knoxville APC
Bob Rogers, Memphis APC
Ron Culberson, Central Office APC
~~and Billy Pugh, Central Office APC~~



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

**DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531**

December 5, 2007

CERTIFIED MAIL: 7007 0220 0000 1425 2802
RETURN RECEIPT REQUESTED

Mr. David Lutz
U.S. Environmental Protection Agency
109 TW Alexander Drive
MD C304-06
RTP, NC 27711

Dear Mr. Lutz:

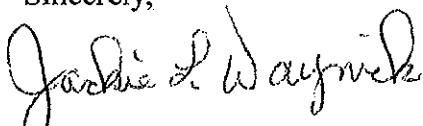
This letter is to advise you the State of Tennessee has completed entry of a portion of its ambient ozone data for the 2007 monitoring season into AQS. Ozone data for reporting organizations 1025, 0581, 0682, 0673, and 0170 have been evaluated according to EPA criteria and is complete and accurate to the best of this agency's knowledge. Copies of the AMP 255 Excel Summary Reports and AMP 450 Report are enclosed with this letter and have been forwarded to you electronically. Please proceed with placing the proper certification flag on this data in AQS.

We have flagged a number of days we believe ozone was affected by exceptional events in 2007. Our initial request to confirm the exceptional events was sent to Region 4's Doug Neeley on August 3, 2007. A final package is being prepared at this time for submittal.

David Lutz
December 5, 2007
Page 2

If you have any questions regarding this matter or need additional information, please contact Mr. Billy Pugh at (615) 532-0528. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Jackie L. Waynick".

Jackie L. Waynick, Manager
Technical Services Program

JLW/jct

Enclosure

cc: Darren Palmer, EPA Region 4
Danny France, EPA Region 4
Lynne Liddington, Knoxville APC
Bob Rogers, Memphis APC
Robert H. Colby, Chattanooga APC
Rob Raney, Nashville APC

TENNESSEE'S EARLY ACTION COMPACT AREAS SUMMARY

This document represents Tennessee's final Early Action Compact (EAC) submittal in accordance with the EAC protocol. The regulatory State Implementation Plan (SIP) was required for the December 31, 2004 EAC milestone, and demonstrated the early attainment of the 8-hour ozone standard. Consistent with the tenets of the Early Action Compacts on file with the United States Environmental Protection Agency, the Tennessee State Implementation Plan has been amended by the Air Pollution Control Board to incorporate the air quality analysis technical documentation and quantification of control measures being implemented in the Early Action Compact areas in Middle Tennessee, Chattanooga and the Tri-Cities area of the state. The SIP was submitted to EPA December 29, 2004.

This SIP submittal included the addendum to the modeling that was provided in the November 2nd public hearing package and demonstrated that all three EAC areas in Tennessee would attain the 8-hour ozone standard by December 31, 2007. With this final EAC submittal, the state has certified that the 2005 through 2007 ozone data has been quality assured, shows attainment, and all of the EAC areas have been successful in attaining the 8-hour ozone NAAQS standard prior to December 31, 2007.

The Local Portion for each EAC area shows that control measures have been maintained through December 2007. Each EAC area has provided a detailed Final Progress Report showing their commitment to clean air and achieving the 8-hour ozone standard.

Enforceable state control measures implemented in Chapter 1200-3-29 Light-Duty Motor Vehicle Inspection and Maintenance, Chapter 1200-3-36 Motor Vehicle Tampering, and Chapter 1200-3-18-.22 and .24 for Stage I Gasoline Vapor Recovery were provided in the December 2004 SIP submittal.

CERTIFICATION OF OZONE DATA 2005 - 2007

The August 21, 2007 letters sent to each EAC area in Tennessee (Chattanooga, Nashville and Tri-Cities) included instructions from EPA on the final written documentation required to be submitted by each EAC area in order to achieve the next required milestone for the EAC areas. Each EAC area was asked to supply a letter "certifying that the 2007 8-hour ozone ambient air monitoring data for each EAC area has been quality assured and entered into the Air Quality System (AQS) by December 31, 2007." Additionally EPA has requested "a second letter" "that the State has certified that the 2005 through 2007 ozone season monitoring data for each EAC area has been quality assured and shows attainment with the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS). The second letter is also due by December 31, 2007." In order to comply with this request, the following dates are provided that document the certification and completion of the entry of the quality assured

data by Tennessee into AQS for the ozone monitoring sites located in the EAC areas of the state.

Calendar Monitoring Year	Date of Certification Letter to EPA
2005	June 23, 2006
2006	June 27, 2007
2007	December 5, 2007

The date of submittal of the letter for the 2007 ozone monitoring season reflects compliance with the requested December 31, 2007 due date. The 2005 and 2006 letter submittal dates also reflect compliance with the December 31, 2007 requested due date. Copies of the specified letters are also included for reference in an electronic file: (Tennessee Data Certifications 2005 2006 2007.pdf).

The discussion of progress in implementation of all applicable control measures by each EAC is provided in the December 21, 2007 milestone report. The following table confirms that the EAC areas in Tennessee demonstrate “attainment with the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS)” based on the 2005 through 2007 certified and quality assured ozone monitor data.

EAC Areas	County	Site Name	MONITOR ID	2007 4th Max.	Final 2005 2007 DV
Chattanooga EAC Area	Hamilton Co	6200 Bonny Oaks Drive, Eastside Filter Plant	470654003 - 1	0.089	0.084
	Hamilton Co	Soddy Daisy H.S., 620 Sequoyah RD.	470651011 - 1	0.085	0.083
	Meigs Co	8401 Highway 60	471210104 - 1	0.083	0.081
Nashville EAC Area	Davidson Co	1015 Trinity Lane	470370011 - 1	0.076	0.072
	Davidson Co	Percy Priest	470370026 - 1	0.08	0.079
	Rutherford Co	Eagleville Puckett'S Farm	471490101 - 1	0.089	0.08
	Sumner Co	Rockland Recreation Area-Old Hickory Dam	471650007 - 1	0.083	0.084
	Sumner Co	Cottontown Wright's Farm	471650101 - 1	0.085	0.082
	Williamson Co	Fairview Middle School Crow Cut Road	471870106 - 1	0.085	0.077
Tri-Cities EAC Area	Wilson Co	Cedars Of Lebanon State Park	471890103 - 1	0.085	0.082
	Sullivan Co	Hill Road	471632002 - 1	0.09	0.083
	Sullivan Co	Ketron Middle School On Bloomingdale Rd.	471632003 - 1	0.085	0.083

Data as of 12/10/2007 (2007)

With this final EAC submittal, it is the state's belief that the necessary documentation showing that all EAC areas in the State of Tennessee have successfully achieved attainment of the 8-hour ozone standard as shown by monitoring data for 2005 through 2007.

Tri-Cities Early Action Compact Progress Report June 2007

The Tri-Cities Area Early Action Compact local plans continue to be implemented as proposed. Open burning bans remain in effect in Carter, Hawkins, Sullivan, Unicoi and Washington Counties only on Ozone Action Days. These bans prohibit open burning of wood wastes. Resolutions passed in 2005 by these counties impose a \$50 fine for violators of the open burning regulation. Also, the Ozone Action Partnership is continuing its annual Ozone Action Day program as in previous years. Since 2002, the Partnership has been responsible for distributing ozone forecast data and public service information to the local Tri-Cities news media and others interested businesses and industries. In March of 2007, the Ozone Action Partnership awarded the Annual Ozzie Awards to individuals, local government leaders, and educators. These awards recognize programs or projects that contribute to improving air quality in the northeast Tennessee region during the year.

In April 2007, the Ozone Action Partnership hosted its annual Media Day in Kingsport. The Media Day is designed as a “kick-off” to ozone season and to inform the news media of any changes in the ozone forecasting process over the past year. Almost every media outlet in the Tri-Cities was represented at the event and most continue to participate in providing the daily forecast or Ozone Action Day notifications to the general public. Regional efforts and initiatives to improve air quality were discussed and subsequently received excellent media coverage during the start of the 2007 ozone season.

Last year, the Sullivan County, Tennessee governing body approved a resolution requesting lowering truck speed limits by 10 mph on Interstates 81 and 26 in Sullivan County. These changes became effective in the Spring of 2007 and will continue to have a positive effect on the efforts to reduce NOx emissions.

Transportation Emission Reduction Control Measures – Bristol MPO

The Bristol Metropolitan Planning Organization, in cooperation with the Tennessee Department of Transportation and Virginia Department of Transportation, is responsible for transportation planning for the Bristol urbanized area under the directives and policies of the U.S. Department of Transportation. In addition to Bristol, Tennessee, the City of Bluff City Tennessee, the City of Bristol Virginia and portions of Sullivan County, Tennessee, and Washington County, Virginia, are member jurisdictions of the Bristol MPO.

Long-range transportation planning and traffic management to improve the performance of the local transportation network through preservation, operational and capacity enhancements are the emphasis of the MPO. The *Bristol Urban Area Long Range Transportation Plan Year 2030*, adopted by the MPO in 2006, provides recommended improvements for highways, public transportation services, and bikeway/pedestrian facilities. A major focal point of the transportation plan is to forecast future traffic volumes and capacity constraints so that mitigating measures can be implemented to reduce traffic congestion. In addition to transportation improvements, congestion management strategies identified in the plan include appropriate timing of traffic signals to decrease congestion, improve air

quality and reduce fuel consumption; more efficient operation of the existing highway network; and limited access points in highway design.

Several current projects and planning activities in the MPO study area will assist in regional air quality goals. Annual transportation system management projects provide intersection analysis and modifications to signal phasing to reduce delay and traffic time, thus reducing vehicle idling time. Construction of the Anderson Street Bridge over the railroad mainline began in May 2006 and will be completed in January 2008. This project provides an alternate route for a high volume at-grade railroad crossing, which results in substantial delay and vehicle idling. Associated with the Anderson Street Bridge project, the Pennsylvania Avenue/State Street intersection was completed in June 2006 to add turning movements and signal synchronization to reduce traffic delay. Independent of this project, three additional intersections on SR 394 at US 11E and SR 390 are currently in the design phase for signalization and will be interconnected to reduce delay and travel time. This project is scheduled for letting in 2008.

Certain strategies that deal with land use policies and growth management can be effective in managing congestion although they are somewhat beyond the control of the MPO since land use decisions are made by local jurisdictions. The City of Bristol Tennessee has approved a *Land Use and Transportation Plan*, which evaluates the land use and transportation relationship within the City and the Urban Growth Boundary and provides recommendations for more efficient use of the transportation system and appropriate land uses. The *Land Use and Transportation Plan* has been formally adopted by City Council to guide future development within the City.

The Bristol MPO and Tennessee Department of Transportation are developing a Regional Intelligent Transportation Systems (ITS) architecture and deployment plan for the Bristol Region. ITS technologies are used to improve safety and increase the efficiency of the transportation system. Implementation of ITS technology will provide additional resources to assist with the management of regional air quality goals, primarily in traveler information dissemination and traffic management. Although no specific projects are currently programmed for funding, development of the architecture is the initial stage of the meeting federal requirements for ITS implementation.

The City of Bristol Tennessee currently maintains 5.6 miles of continuous bicycle/pedestrian facilities. The City recently completed the development of the *Bristol, Tennessee Bicycle and Pedestrian Plan* to develop a strategy to provide a network of alternative transportation modes between various land uses including residential, recreational, and commercial areas. The plan identifies future pedestrian and bicycle improvements and establishes priorities and timeframes for project implementation. In November 2006, the City of Bristol awarded a contract for the construction of pedestrian improvements along Volunteer Parkway and Highway 11E near the Bristol Motor Speedway. Phase I and Phase II of the project have been completed (2,900 linear feet), Phase III is under construction (5,368 linear feet). The fourth and final phase of the project is programmed for 2008. When fully constructed, the total project will provide 12,400 linear feet of sidewalk. As part of this sidewalk improvement project, the Tennessee Department of Transportation is reconstructing four roadway bridges over Back Creek and Beaver Creek, which currently have no shoulders for the walking or biking public. The new bridges will provide pedestrian walkways as part of the bridge reconstruction. The project was on the TDOT December 7, 2006 letting, and is pending approval of the apparent low bidder.

To support alternative modes of transportation, the Bristol Tennessee Transit system provides fixed-route and specialized transit services in cooperation with Bristol Virginia Transit. The fixed-route system provides public transportation services connecting residential areas within the City to commercial, educational, and medical facilities. In addition to the fixed-route service, the transit system operates a job access transportation program, which provides a coordinated transportation network between Bristol Tennessee Transit, the rural transportation provider N.E.T. Trans, and local human service agencies to make access to jobs, childcare services, and educational job training more accessible for welfare recipients and low-income individuals.

Kingsport Metropolitan Planning Organization

The Kingsport Metropolitan Planning Organization is major partner in the Ozone Action Partnership Team. The Kingsport MPO, in cooperation with the Tennessee Department of Transportation and Virginia Department of Transportation, is responsible for long-range transportation planning within the Kingsport Urbanized Area. The Kingsport MPO jurisdiction includes; City of Kingsport, portion of Sullivan County, Town of Mount Carmel, Town of Church Hill, portion of Hawkins County, Gate City Virginia, Weber City Virginia, and a portion of Scott County Virginia. Furthermore, the Kingsport MPO works very closely with the Tennessee Department of Transportation, Virginia Department of Transportation, Federal Highway Administration, Federal Transit Administration, and local governments in the overall planning and implementation process.

The Kingsport MPO focuses on six major tasks; (1) long-range transportation planning, (2) traffic and demographic data collection, (3) grantsmanship; SAFETEA-LU enhancement grants (i.e. pedestrian greenways), FTA grants, and FHWA grants, (4) traffic systems management (TSM), improving the level of service to motorists, (5) administration of funding and scheduling of area street and highway projects, (6) and assisting in the local mass transit program by developing short and long-term capital and operating plans.

One of the major responsibilities of the Kingsport MPO is to maintain and implement a 25 year long-range transportation plan (LRTP). This plan covers every aspect involved in the transportation planning process by addressing such items as; volume to capacity for the roadway system in the MPO jurisdiction, travel time improvements, intelligent transportation systems (ITS), congestion mitigation, public transportation, future conditions, pedestrian mobility. A major focal point of the LRTP is to forecast future traffic volumes and capacity constraints so that mitigating measures can be implemented to reduce traffic congestion. Additionally, the LRTP is broken down into 4 Tiers; Tier 1 is Projects Under Development plus Committed Projects, Tier 2 is Future Congestion Mitigation Projects, Tier 3 is Future Safety, Access, Economic Development Projects, and Tier 4 is Future Conceptual Projects. Within these 4 Tiers, various transportation improvements are recommended for the existing street network or recommendations for new roadways.

This past year, MPO Staff spent a considerable amount of time modifying the LRTP in order to make the document SAFETEA-LU compliant. In regards to Air Quality, the updated plan provides an overview of the existing transportation system, public transportation services, bikeway/pedestrian facilities and evaluates future transportation improvements. Alternative highway networks and transportation modes are assessed from an implementation and financial standpoint to satisfy future transportation forecasts. Chapter 9 provides information about Air Quality Concerns and a description of the EAC's efforts to ensure the continued deferral on non-attainment status.

In addition to the revising the LRTP, the Kingsport MPO is also working on projects that should benefit Air Quality. Over the past year the MPO has worked closely with the Kingsport Area Transit Service (KATS) to further develop and improve the public transportation system. This joint venture will continue in the future while researching means of building partnerships throughout the Tri-Cities region. The MPO, along with the Kingsport Parks and Recreation Department, has continued its efforts to further expand and enhance the use of the City's Greenbelt (an 8-mile linear pedestrian trail that links neighborhoods, schools, and commercial districts). With help from the Transportation Enhancement (TE) program and planned expansion should be under construction by early next year. Another TE application was submitted in 2007 for a project that will extend the Greenbelt across the Holston River. This connection will link Sullivan and Hawkins Counties by way of the Greenbelt and also tie in several neighborhoods to the pedestrian trail system that previous had to drive to the facility in order to use it. After years of planning, construction on Watauga Roundabout began in the fall. With the installation of a roundabout traffic will be able to move through this intersection with minimal delays. As part of the TSM initiative, the traffic signal system was analyzed and adjusted to improve the flow of traffic where possible. The MPO also began work of developing an ITS Architecture and Deployment Plan. This plan will incorporate data processing and data communications technologies that will help increase the safety and efficiency of the surface transportation system. This plan is scheduled to be complete by spring 2008. The Kingsport MPO website includes information relating to air quality and ways in which citizens can help do their part to improve the quality of the air they breathe.

A link is provided for Air Now, the cross-agency US Government website that provides an air quality index and other important resources related to air quality. The Kingsport MPO is dedicated to improving the region's air quality and plans to work closely with the Federal Highway Administration, Federal Transit Administration, Tennessee Department of Transportation, Virginia Department of Transportation, and other agencies to meet this objective.

Johnson City Metropolitan Planning Organization

The City of Johnson City is in the planning/design stage of implementing ITS strategies that will improve traffic flow, reduce traffic congestion and in turn improve air quality. At present Johnson City is looking at SR 381 corridor (State of Franklin road) to implement ITS market packages. This will include but not limited to traffic signal synchronization and other electronic control measures. Other corridors are being looked at but however no final decision has been made at this point. The initial project should start in the first quarter of 2008. The City of Elizabethton is currently in the design stage of implementing an ITS signal synchronization project along S.R. 67 through Elizabethton. This is currently in the design stages and should be complete by the end 2008.